

COMPLIANCE UPDATE By Kim Slote, policy analyst

COMMON MANUAL

The Cooperative Agreement for Guarantors Participating in the *Common Manual* was initially approved Sep. 10, 1995, last amended Aug. 18, 2016. This agreement between guarantors that administer the Federal Family Education Loan Program was for the purpose of publishing a common policy manual to be used as a guide for their schools, lenders, secondary market and servicer clients. For 2019-2020, the *Common Manual* Governing Board is contracted with Ascendium Education Group, formerly Great Lakes Higher Education Corporation, to facilitate the development and adoption of policies that are consistent with the requirements of Title IV of the Higher Education Act of 1965, as amended, applicable regulations and other guidance published by the United States Department of Education. Policy proposals are presented to the *Common Manual* Governing Board for consideration and approval, before being incorporated into the *Common Manual*.

Proposed policy updates and technical edits can be submitted by anyone in the FFELP community. In addition, comments on current proposals are welcomed by Ascendium Education Group on behalf of the *Common Manual* Governing Board. Instructions for how to submit comments or to submit policy proposals and technical edits for the *Common Manual* can be found at the following links.

- Submit Policy Proposals/Tech Edits
- Review Proposals Out for Comment

The *Common Manual* Governing Board approved policy changes proposed in Batch 219 January 16, 2020. Summaries of the most recent policy updates made to the July 2019 reprint of the *Common Manual* will be posted to the *Common Manual* website at the following link https://commonmanual.org in the Approved Policies section. The common bulletin language for each policy change drafted by Ascendium Education Group is also provided at this link. The common bulletin language is attached to this compliance update, without revision, for your review. Changes made in the proposals will be incorporated into the *Common Manual* annual update.

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Policy Change Approved January 16, 2020

Unified Student Loan Policy

Batch 219: Proposal 1330

The nation's guarantors provide the following summaries to inform schools, lenders, and servicers of the latest *Common Manual* policy changes. These changes will appear in the manual's next annual update. These changes will also be incorporated into the Integrated *Common Manual*. The Integrated *Common Manual* is available on several guarantor websites, and it is also available on the *Common Manual's* website at https://commonmanual.org. Please carefully note the effective date of each policy change.

IDR Request as a Cure

The *Common Manual* has been updated to clarify that a signed Income-Driven Repayment Plan Request qualifies as a repayment agreement for purposes of curing a loan that has lost its guarantee.

Affected Section(s): 14.5 Cures and Reinstatement of the Guarantee

Effective Date: Income-Driven Repayment (IDR) Plan Requests received after

October 28, 2019, unless guarantor implemented earlier.

Basis: Private letter guidance from the Department (Jon Utz) dated

October 28, 2019.

Policy Information: 1330/Batch 219

Guarantor Comments: Guarantors will accept a signed Income-Driven Repayment Plan

Request as a curing instrument in the same manner as any other

signed repayment agreement.